

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
MIDLAND-ODESSA DIVISION**

**MATTHEW J. PEASE,**

**Plaintiff,**

**V.**

**SECURITIES & EXCHANGE  
COMMISSION, FINANCIAL  
INDUSTRY REGULATORY  
AUTHORITY, JOHN BRDA,  
GREGORY MCCABE, NEXT BRIDGE  
HYDROCARBONS, INC.**

## Defendants.



**CASE NO. 24-cv-00322-DC-RCG**

**AGREED MOTION FOR EXTENSION OF TIME TO RESPOND  
TO THE SECOND AMENDED COMPLAINT**

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure (“FRCP”), Defendant Gregory McCabe (“McCabe”) requests a 60-day extension of time to May 23, 2025, to respond to Plaintiff’s Second Amended Complaint (ECF 12).

In support of this motion, McCabe states as follows:

1. This motion is McCabe's first request for an extension of time with respect to this response deadline.
2. Counsel for McCabe conferred with pro se Plaintiff, Matt Pease, by phone and he agreed to extend the deadline to respond to Plaintiff's Second Amended Complaint until May 23, 2025. Despite multiple attempts, Plaintiff has not responded to an email inquiry on same. Defendant Securities and Exchange Commission is the only other party to appear in this Case as of the date of this filing.

3. McCabe requests additional time to prepare his response to the Second Amended Complaint because of its breadth. On February 26, 2025, but served on March 3, 2025, Plaintiff filed his Second Amended Complaint which contains 328 enumerated allegations and/or paragraphs and asserts 17 separate counts.

WHEREFORE, McCabe respectfully moves for an extension of time from March 24, 2025, to and including May 23, 2025, to move to dismiss or otherwise respond to the Second Amended Complaint.

Respectfully submitted,

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By: /s/ Jill C. Pennington

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**ATTORNEY FOR DEFENDANT**

**GREGORY MCCABE**

**CERTIFICATE OF SERVICE**

I hereby certify that on this 21st day of March 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to:

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/s/ Jill C. Pennington  
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